



**CARPETAMERICARECOVERYEFFORT<sup>SM</sup>**  
Developing market-based solutions for the recycling & reuse  
of post-consumer carpet

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April 17, 2017

Scott Smithline, Director  
CalRecycle  
1001 I St  
Sacramento, CA 95814

**Re: Response to CalRecycle's Staff Findings- Carpet Stewardship Plan 2017-2021**

Director Smithline:

This letter responds to the findings prepared in connection with CalRecycle's consideration of the Request for Approval of CARE's Carpet Stewardship Plan 2017-2021 ("Plan") on April 20, 2017.

CARE is obviously disappointed in the staff's recommendation to disapprove the plan, and believes that instead, additional time should be given for CARE and CalRecycle to meet to address the issues raised by the findings. We also feel strongly that this additional time will accomplish two important objectives: first and foremost is to ensure the continuation of subsidies and grants to the plan's participants, and second provide for face-to-face dialog for understanding. Therefore, we would respectfully request that the previous California Carpet Stewardship Plan, as amended by Addendums 1-3, remain in effect for an additional 60 days, pending CARE's work with CalRecycle on an agreeable plan.

As the only Carpet Stewardship Organization in California, CARE firmly believes that the Plan must be adequately funded. CARE also believes that the financial mechanism in the Plan, should balance reasonable concerns of carpet manufacturers and retailers, to ensure that carpet remains a viable flooring option into the future. With this in mind, a decision to disapprove the revised Plan, and to commence enforcement action of up to \$10,000 per day against all sellers of carpet in California, would cause catastrophic damage to homebuilders, retailers, manufacturers and consumers. We urge you to give CARE the additional time necessary to work with CalRecycle to resolve the plan's deficiencies.

I will be arriving in Sacramento at noon today. Please feel free to contact me directly should you wish to speak prior to the hearing.

Thank you for your consideration.

Respectfully submitted,

Robert Peoples, Ph.D.  
Executive Director  
Carpet America Recovery Effort (CARE)